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Rachel Perillo

March 25, 2022

By ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Mustapha Raji
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-referenced matter. Mr. Raji is currently on pretrial release and subject to location monitoring among other conditions of release. He currently lives alone at a residence in Hollywood, Florida. This letter is respectfully submitted to request the Court's permission for Mr. Raji to move to a home located in Fort Lauderdale, Florida for medical reasons.

As the Court is aware from our original bail application and subsequent bond modification requests, Mr. Raji suffers from several medical conditions including a serious heart condition that requires continued monitoring and treatment. Mr. Raji's health condition has worsened in recent weeks and it is no longer in his best health interest to live alone. If permitted by the Court, Mr. Raji intends to move in with people whom he knows through the Smile of Hope Children's Charity and Refugee Center, for which he does volunteer work. Mr. Raji knows the pastor who runs the charity and his children very well. Also living in the home will be the adult children of the pastor as well as a 72-year-old female relative of the children. Making this move would ensure that Mr. Raji will not be alone in the event of a medical emergency, and these individuals, one of whom has emergency medical training, can also assist him with going to and from medical treatment and with obtaining his medications.

Accordingly, because Mr. Raji's current Hollywood, Florida address is reflected on the original Bond Order, it is respectfully requested that the Court grant Mr. Raji permission to move to Fort Lauderdale, Florida.

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The government, by AUSA Dina McLeod, has no objection this request. My office has also conferred with Pretrial Services Officer Jason Jacoby, Mr. Raji's supervising officer in the Southern District of Florida, and Pretrial Services Officer Joshua Rothman of the Southern District of New York, neither of whom object to this request. Mr. Raji will provide all of the necessary information to Pretrial and will coordinate the move with his supervising officer in Florida.

Finally, given Mr. Raji's urgent medical needs it is respectfully requested that the Court grant this application as soon as possible.

The Court's time and attention to this matter is appreciated.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Dina McLeod (By ECF)
AUSA Eun Young Choi (By ECF)
USPTO Jason Jacoby (By Email)
USPTO Joshua Rothman (By Email)